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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

AUG 22 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 01-11
Table of Allotments)	RM-10027
FM Broadcast Stations.)	RM-10322
(Murrieta, Arcadia, Fallbrook,)	
Yucca Valley and Desert Hot Springs,)	
California).)	

To: Chief, Allocations Branch

SUPPLEMENT TO AMENDMENT TO COMMENTS AND COUNTERPROPOSAL

Big City Radio-LA, L.L.C. ("Big City Radio"), the licensee of KLYY(FM), Channel 296A, Arcadia, California, and KSYY(FM), Channel 296A, Fallbrook, California, by its attorneys, hereby submits this Supplement to its January 18, 2002, Amendment to Comments and Counterproposal (the "Amendment") in the above-captioned proceeding. This supplement is being filed in response to a request from the Commission staff and includes supplemental engineering data in support of the Amendment.

Respectfully submitted,

BIG CITY RADIO-LA, L.L.C.

By: 

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August 22, 2002

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CERTIFICATE OF SERVICE

I, Charlene Jones, a legal secretary with the law firm of Hogan & Hartson L.L.P., hereby certify that on this 22nd day of August, 2002, a copy of the foregoing Supplement to Amendment to Comments and Counterproposal, has been served by first class mail to:

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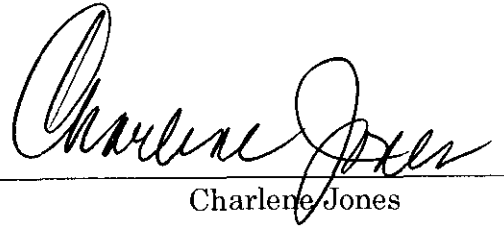
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Charlene Jones

*/ By hand.



**STATEMENT OF HERMAN E. HURST, JR.
PROVIDING SUPPLEMENTAL ENGINEERING DATA
CONCERNING COMMENTS AND COUNTERPROPOSAL
MM DOCKET No. 01-11, RM-10027, RM-10322**

I am a Radio Engineer, an employee in the firm of Carl T. Jones Corporation with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

This office has been authorized by Big City Radio-LA, L.L.C., ("Big City Radio"), licensee of KLYY(FM), Arcadia, California, and KSYF(FM), Fallbrook, California, to prepare this statement providing supplemental information in support of an earlier filed amendment to comments and counterproposal which advanced a technical solution to the mutually exclusive channels proposed by proponents in MM Docket No. 01-11. The initial Notice of Proposed Rule Making proposed allotting Channel 281A to Murrieta, California. In Comments, Big City Radio proposed alternative channels for Murrieta, Arcadia, and Fallbrook as well as relocation of Channel 295 from Yucca Valley to Desert Hot Springs.

On January 18, 2002, Big City Radio submitted an amendment to comments and counterproposal in the above referenced Rulemaking proceeding. That submittal contained a statement prepared by this office, setting forth technical details of a solution to the conflicting allotment proposals.

The earlier submittal by Big City providing its original counterproposal in this proceeding was submitted in March 2001. The technical exhibits supporting the counterproposal included detailed studies of areas and populations which would gain and lose service along with other existing aural services available to these areas. These studies used the following methodology:

- 1) Service areas of allotments proposed as New or changed in class were calculated using a radius defining normally protected service contours for maximum facilities for each class (ie: Class A, 60 dBu @ 28 km; Class B1, 57 dBu @ 44.7 km; Class B, 54 dBu @ 65 km).
- 2) Other aural service studies were based on prediction of FM station service areas in the same manner as the proposed and existing allotments, while AM stations were considered based on daytime primary service contours (ie: 0.5 mV/m contours).

- 3) All population data presented was based on the 1990 Census of the United States, since, in March 2001, the 2000 Census data was unavailable in electronic form.

Commission staff has requested Big City provide a revised study describing the service areas of proposed allotments as well as existing aural service to areas of service gained and lost, in a manner conforming to the procedure established by the Commission for comparison of service areas of mutually exclusive proposed allotments.¹ Based on the Greenup, KY decision, the methodology has been modified to provide a depiction of service from all FM allotments and existing stations based on the predicted radius of the 60 dBu contour for maximum facilities for all Classes of Stations (ie: Class A, 60 dBu @ 28 km; Class B, 60 dBu @ 39 km; Class B, 60 dBu @ 52 km). Further, in considering other aural services AM Station coverage is based on the nighttime primary service contour.

To enable a complete comparison between the two presentations, the original population studies were updated to reflect 2000 Census data. In this effort, an error in initial the population data due to a mis-plot of the proposed KLYY Class B1 reference site was discovered. This error only occurred if the populations counting program. The exhibits

¹ Memorandum Opinion and Order, MM Docket No. 86-29, Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Greenup, Kentucky and Athens, Ohio). Adopted April 11, 1989, 66 R 2d, page 366.

ENGINEERING STATEMENT OF HERMAN E. HURST, JR.
PAGE 4

depicting existing Class A coverage and Proposed Class B1 coverage for KLYY were not in error. Accordingly, Table B provides corrected data for the original study, while Table A provides the population and area data for the proposed allotment plan under the Greenup Kentucky methodology.

Inspection of the attached exhibits reveals that considering the proposal utilizing either 60 dBu service contours for all facilities, or the protected contour for the class of each station, will result in substantial gains in populations served when compared with existing services.

Comparing all proposals based on 1.0 mV/m (60 dBu) radii for maximum facilities, the proposed changes at Arcadia, Fallbrook, and Yucca Valley/Desert Hot Springs result in a net increase in service to 2,310,009 persons. In addition, 372,379 people will receive a new service from the Murrieta Class A assignment.

This statement and attached exhibit was prepared by me or under my direct supervision, and it believed to be true and correct, under petition of perjury.

DATED: August 21 ,2002



Herman E. Hurst, Jr.

TABLE A

**GAIN AND LOSS AREA DETAILS
USING ORIGINAL METHODOLOGY, UPDATED US CENSUS 2000 DATA,
AND CORRECTED KLYY CLASS B1 COVERAGE.**

	SQ. KM	POPULATION
KLYY(FM), ARCADIA, CA		
Present Class A (60 dBu)	2,464	3,316,265
Proposed Class B1 (57 dBu)	6,277	8,094,711
Loss Area	228	201,868
Gain Area	4,041	4,975,293
Net Loss/Gain	3,813 (gain)	4,773,425 (gain)
KSYY, FALLBROOK, CA		
Present Class A (60 dBu)	2,464	600,361
Proposed Class A (60 dBu)	2,464	304,375
Loss Area	526	332,101
Gain Area	526	36,115
Net Loss/Gain	0	295,986 (loss)
KYOR, YUCCA VALLEY TO DESERT HOT SPRINGS, CA		
Present Class B (54 dBu)	13,273	499,163
Proposed Class B1 (57 dBu)	6,277	353,638
Loss Area	6,996	145,525
Gain Area	0	0
Net Loss/Gain	6,996 (loss)	145,525 (loss)
TOTAL COMBINED NET GAIN/LOSS	3,183 (loss)	4,331,914 (gain)

TABLE B

**GAIN AND LOSS AREA DETAILS
USING "GREENUP, KENTUCKY" METHODOLOGY**

	SQ. KM	POPULATION
KLYY(FM), ARCADIA, CA		
Present Class A (60 dBu)	2,464	3,316,265
Proposed Class B1 (60 dBu)	4,778	6,049,703
Loss Area	553	773,984
Gain Area	2,867	3,507,422
Net Loss/Gain	2,314 (gain)	2,733,438 (gain)
KSYU, FALLBROOK, CA		
Present Class A (60 dBu)	2,464	600,361
Proposed Class A (60 dBu)	2,464	304,375
Loss Area	526	332,101
Gain Area	526	36,115
Net Loss/Gain	0	295,986 (loss)
KYOR, YUCCA VALLEY TO DESERT HOT SPRINGS, CA		
Present Class B (60 dBu)	8,493	387,976
Proposed Class B1 (60 dBu)	4,778	260,623
Loss Area	3,954	143,782
Gain Area	239	16,429
Net Loss/Gain	3,715 (loss)	127,353 (loss)
TOTAL COMBINED NET GAIN/LOSS	1,401 (loss)	2,310,099 (gain)



Loss Area Population: 773,984 persons
 Loss Area Coverage: 552.7 sq km
 Gain Area Population: 3,507,422 persons
 Gain Area Coverage: 2,867 sq km

CARL T. JONES
 CORPORATION

**EXISTING & PROPOSED COVERAGE CIRCLES
 FOR KLYY, ARCADIA, CA
 CHANNEL UPGRADE 296A TO 296B1
 AUGUST, 2002**

TABLE 1

Facilities Providing Service To The Arcadia, CA Gain Area

MAX = 53

KOST	278B	Los Angeles, CA	KFRN	1280kHz	Long Beach, CA
KSCA	270B	Glendale, CA	KPLS	830kHz	Orange, CA
KKLA-FM	258B	Los Angeles, CA	KHJ	930kHz	Los Angeles, CA
KTWV	234B	Los Angeles, CA	KXMN	1190kHz	Anaheim, CA
KUSC	218B	Los Angeles, CA	KSPN	110kHz	Pasadena, CA
KPWR	290B	Los Angeles, CA	KRLA	870kHz	Glendale, CA
KBIG-FM	282B	Los Angeles, CA	KLAC	570kHz	Los Angeles, CA
KHIS-FM	274B	Los Angeles, CA	KMPC	1540kHz	Los Angeles, CA
KKBT	262B	Los Angeles, CA	KLTX	1390kHz	Long Beach, CA
KLSX	246B	Los Angeles, CA	KVNR	1480kHz	Santa Ana, CA
KLOS	238B	Los Angeles, CA	KABC	790kHz	Los Angeles, CA
KHHT	222B	Los Angeles, CA	KXTA	1150kHz	Los Angeles, CA
KPCC	207B	Pasadena, CA	KTNQ	1020kHz	Los Angeles, CA
KRTH-FM	266B	Los Angeles, CA	KFWB	980kHz	Los Angeles, CA
KLVE	298B	Los Angeles, CA	KWKW	1330kHz	Los Angeles, CA
KMZT-FM	286B	Los Angeles, CA	KDIS	710kHz	Los Angeles, CA
KZLA-FM	230B	Los Angeles, CA	KBLA	1580kHz	Santa Monica, CA
KPFK	214B	Los Angeles, CA	KALI-FM	292A	Santa Ana, CA
KCBS-FM	226B	Los Angeles, CA	KBUE	288A	Long Beach, CA
KROQ-FM	294B	Pasadena, CA	KRCD	280A	Inglewood, CA
KLAX-FM	250B	East Los Angeles, CA	KSSD	276A	Newport Beach, CA
KXOL-FM	242B	Los Angeles, CA	KJLH	272A	Compton, CA
KYSR	254B	Los Angeles, CA	KKJZ	201B	Long Beach, CA
KCRW	210B	Santa Monica, CA	KSSC	276A	Santa Monica, CA
KNX	1070kHz	Los Angeles, CA	KMXN-FM	232A	Garden Grove, CA
KFI	640kHz	Los Angeles, CA	KFSB	228A	Ontario, CA
			KXLU	205A	Los Angeles, CA

MIN = 12

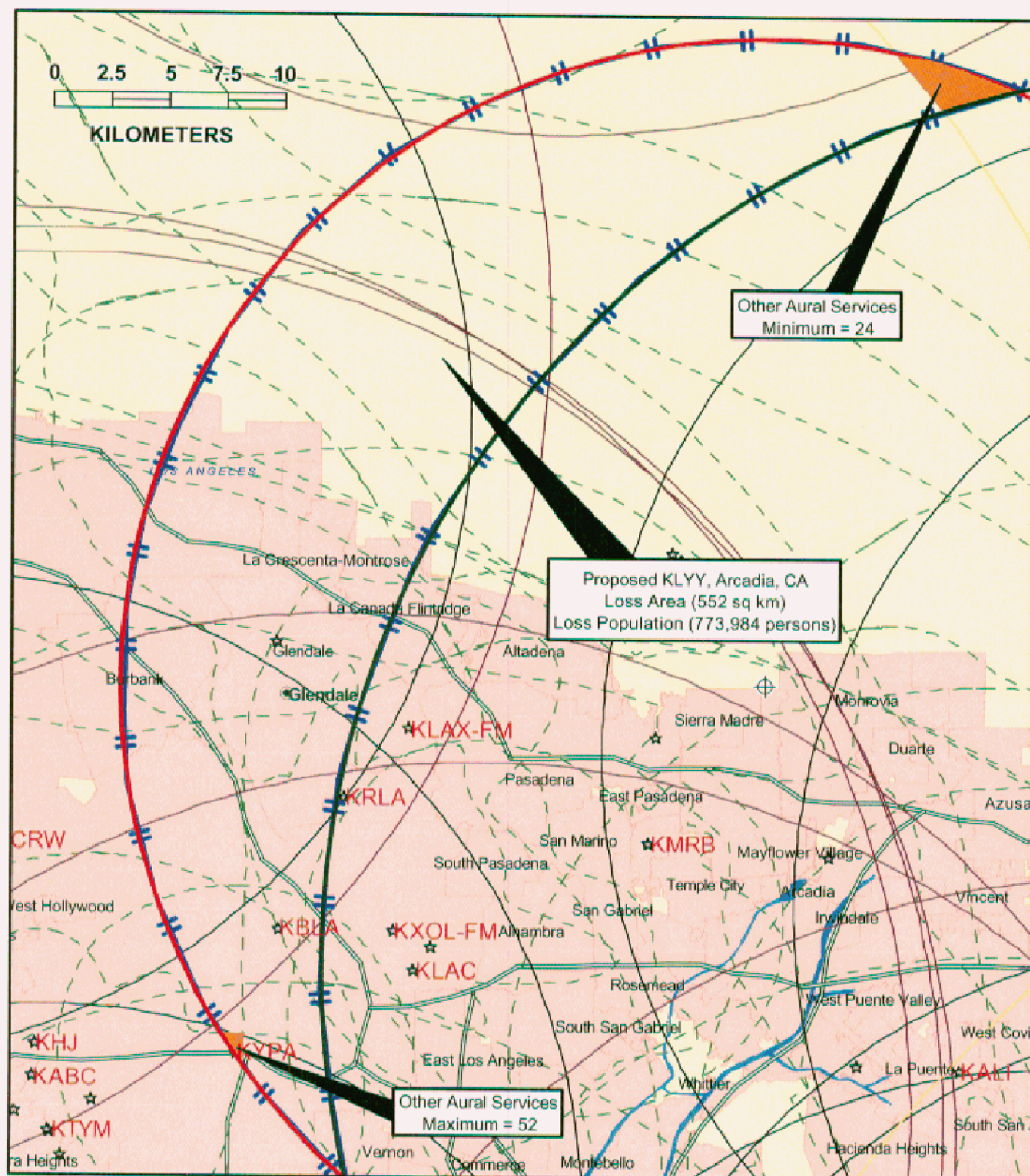
KWVE	300B	San Clemente, CA	KKDD	1290kHz	San Bernardino, CA
KOLA	260B	San Bernardino, CA	KRLH	590kHz	San Bernardino, CA
KFRG	236B	San Bernardino, CA	KPLS	830kHz	Orange, CA
KVCR	220B	San Bernardino, CA	KWRM	1370kHz	Corona, CA
KALI-FM	292A	Santa Ana, CA	KNX	1070kHz	Los Angeles, CA
KUCR	202A	Riverside, CA	KFI	640kHz	Los Angeles, CA

(All of these contours are shown on the attached map Exhibit #2)

Other AM/FM Services (Key to 60dBu Circles and Class Radius)

Class A: Black, 28km Class B1: Purple, 39km

Class B: Yellow, 52km AM: Dashed Green



OTHER AURAL SERVICES
LOSS AREA STUDY FOR KLYY, ARCADIA, CA
WITH MINIMUM & MAXIMUM VALUES
AUGUST, 2002

TABLE 2

Facilities Providing Service To The Arcadia, CA Loss Area

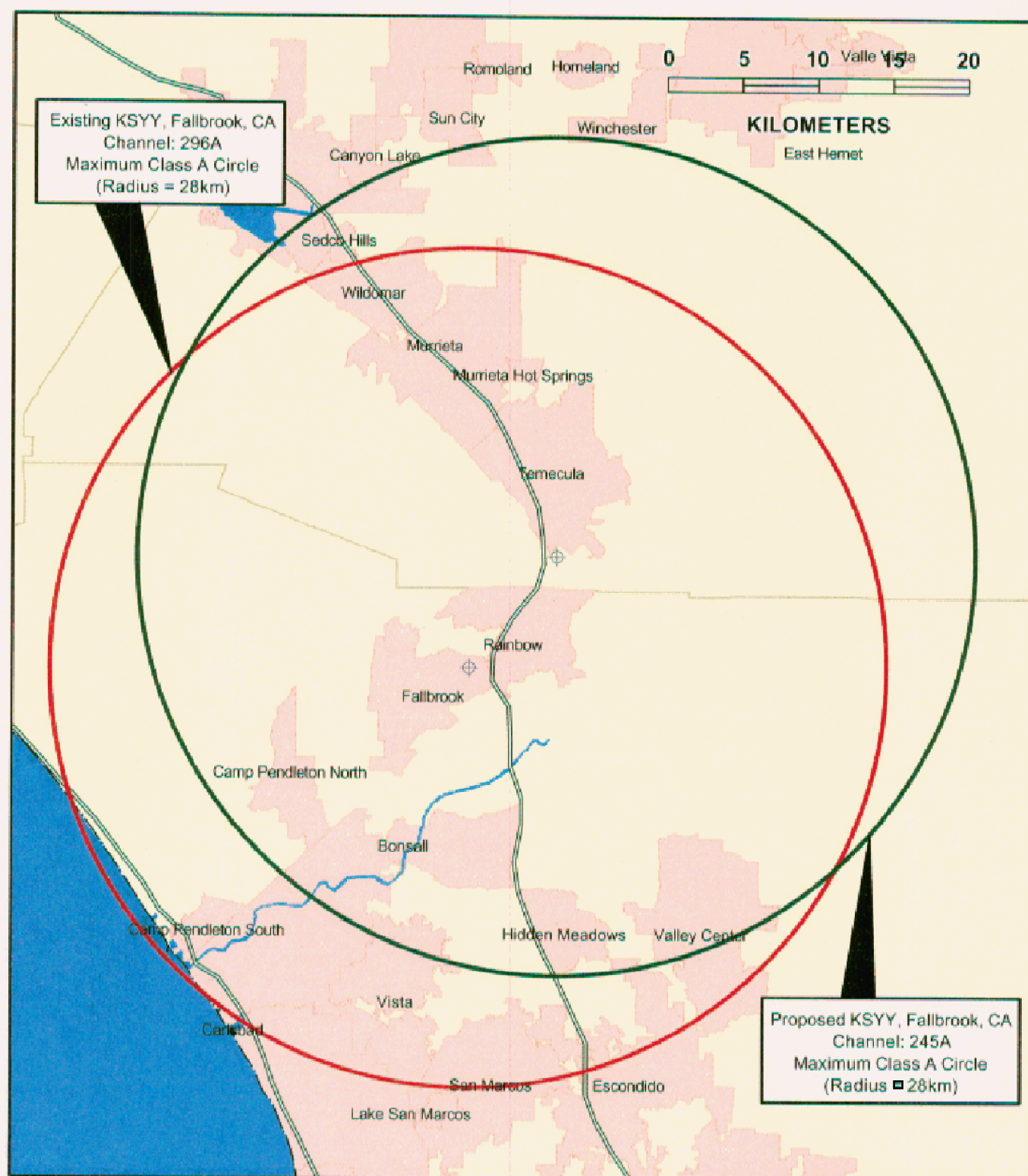
MAX = 52

KBUE	288A	Long Beach, CA	KXOL-FM	242B	Los Angeles, CA
KRCD	280A	Inglewood, CA	KYSR	254B	Los Angeles, CA
KJLH	272A	Compton, CA	KCRW	210B	Santa Monica, CA
KKJZ	201B	Long Beach, CA	KFSB	228A	Ontario, CA
KSSC	276A	Santa Monica, CA	KXLU	205A	Los Angeles, CA
KOST	278B	Los Angeles, CA	KYPA	1230kHz	Los Angeles, CA
KSCA	270B	Glendale, CA	KFRN	1280kHz	Long Beach, CA
KKLA-FM	258B	Los Angeles, CA	KTYM	1460kHz	Inglewood, CA
KTWV	234B	Los Angeles, CA	KHJ	930kHz	Los Angeles, CA
KUSC	218B	Los Angeles, CA	KSPN	110kHz	Pasadena, CA
KPWR	290B	Los Angeles, CA	KRLA	870kHz	Glendale, CA
KBIG-FM	282B	Los Angeles, CA	KLAC	570kHz	Los Angeles, CA
KIIS-FM	274B	Los Angeles, CA	KYPA	1230kHz	Los Angeles, CA
KKBT	262B	Los Angeles, CA	KFOX	1650kHz	Torrance, CA
KLSX	246B	Los Angeles, CA	KMPC	1540kHz	Los Angeles, CA
KLOS	238B	Los Angeles, CA	KLTX	1390kHz	Long Beach, CA
KHHT	222B	Los Angeles, CA	KABC	790kHz	Los Angeles, CA
KPCC	207B	Pasadena, CA	KXTA	1150kHz	Los Angeles, CA
KRTH-FM	266B	Los Angeles, CA	KTNQ	1020kHz	Los Angeles, CA
KLVE	298B	Los Angeles, CA	KFWB	980kHz	Los Angeles, CA
KMZT-FM	286B	Los Angeles, CA	KWKW	1330kHz	Los Angeles, CA
KZLA-FM	230B	Los Angeles, CA	KDIS	710kHz	Los Angeles, CA
KPFK	214B	Los Angeles, CA	KBLA	1580kHz	Santa Monica, CA
KCBS-FM	226B	Los Angeles, CA	KSUR	1260kHz	Beverly Hills, CA
KROQ-FM	294B	Pasadena, CA	KNX	1070kHz	Los Angeles, CA
KLAX-FM	250B	East Los Angeles, CA	KFI	640kHz	Los Angeles, CA

MIN = 24

KOST	278B	Los Angeles, CA	KPCC	207B	Pasadena, CA
KSCA	270B	Glendale, CA	KRTH-FM	266B	Los Angeles, CA
KKLA-FM	258B	Los Angeles, CA	KLVE	298B	Los Angeles, CA
KTWV	234B	Los Angeles, CA	KMZT-FM	286B	Los Angeles, CA
KUSC	218B	Los Angeles, CA	KZLA-FM	230B	Los Angeles, CA
KPWR	290B	Los Angeles, CA	KPFK	214B	Los Angeles, CA
KBIG-FM	282B	Los Angeles, CA	KCBS-FM	226B	Los Angeles, CA
KIIS-FM	274B	Los Angeles, CA	KROQ-FM	294B	Pasadena, CA
KKBT	262B	Los Angeles, CA	KLAX-FM	250B	East Los Angeles, CA
KLSX	246B	Los Angeles, CA	KXOL-FM	242B	Los Angeles, CA
KLOS	238B	Los Angeles, CA	KNX	1070kHz	Los Angeles, CA
KHHT	222B	Los Angeles, CA	KFI	640kHz	Los Angeles, CA

(All of these contours are shown on the attached map Exhibit #3)



Loss Area Population: 332,101 persons

Loss Area Coverage: 526.2 sq km

Gain Area Population: 36,115 persons

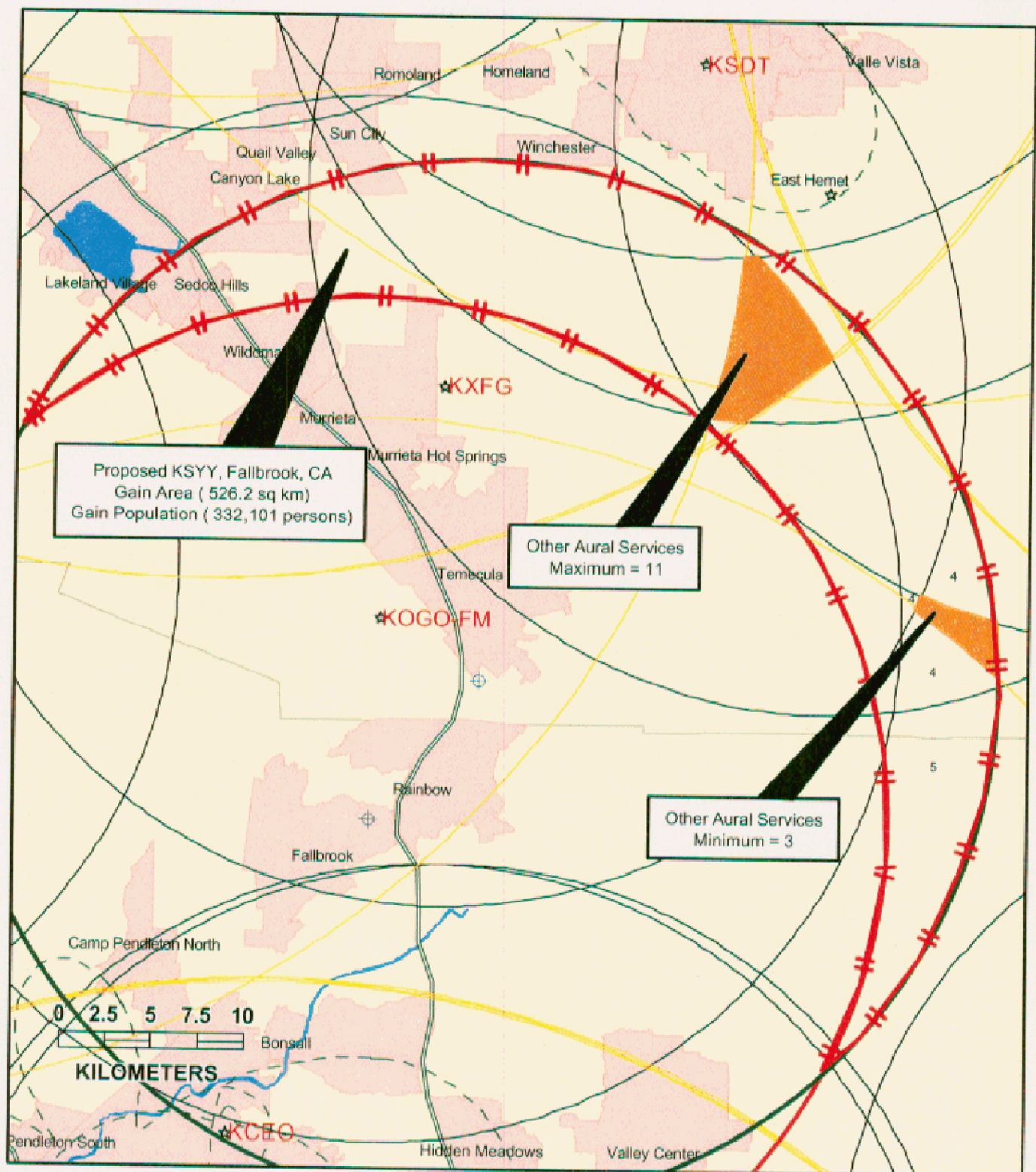
Gain Area Coverage: 526.2 sq km

CARL T. JONES
CORPORATION

**EXISTING & PROPOSED COVERAGE CIRCLES
FOR KSYY, FALLBROOK, CA
CHANNEL SWITCH 296A TO 245A
AUGUST, 2002**

Other AM/FM Services (Key to 60dBu Circles and Class Radius)
 Class A: Black, 28km Class B1: Purple, 39km
 Class B: Yellow, 52km AM: Dashed Green

EXHIBIT 5



OTHER AURAL SERVICES
 GAIN AREA STUDY FOR KSYY, FALLBROOK, CA
 WITH MINIMUM & MAXIMUM VALUES
 AUGUST, 2002

TABLE 3

Facilities Providing Service To The Fallbrook, CA Gain Area

MAX = 11

KOLA	260B	San Bernardino, CA	KATY-FM	267A	Idyllwild, CA
KVCR	220B	San Bernardino, CA	KGBB	277A	Temecula, CA
KLRD	211B	Yucaipa, CA	KOGO-FM	233A	Temecula, CA
KXRS	289B	Hemet, CA	KNX	1070kHz	Los Angeles, CA
KXFG	225A	Sun City, CA	KFI	640kHz	Los Angeles, CA
KWRP	241A	San Jacinto, CA			

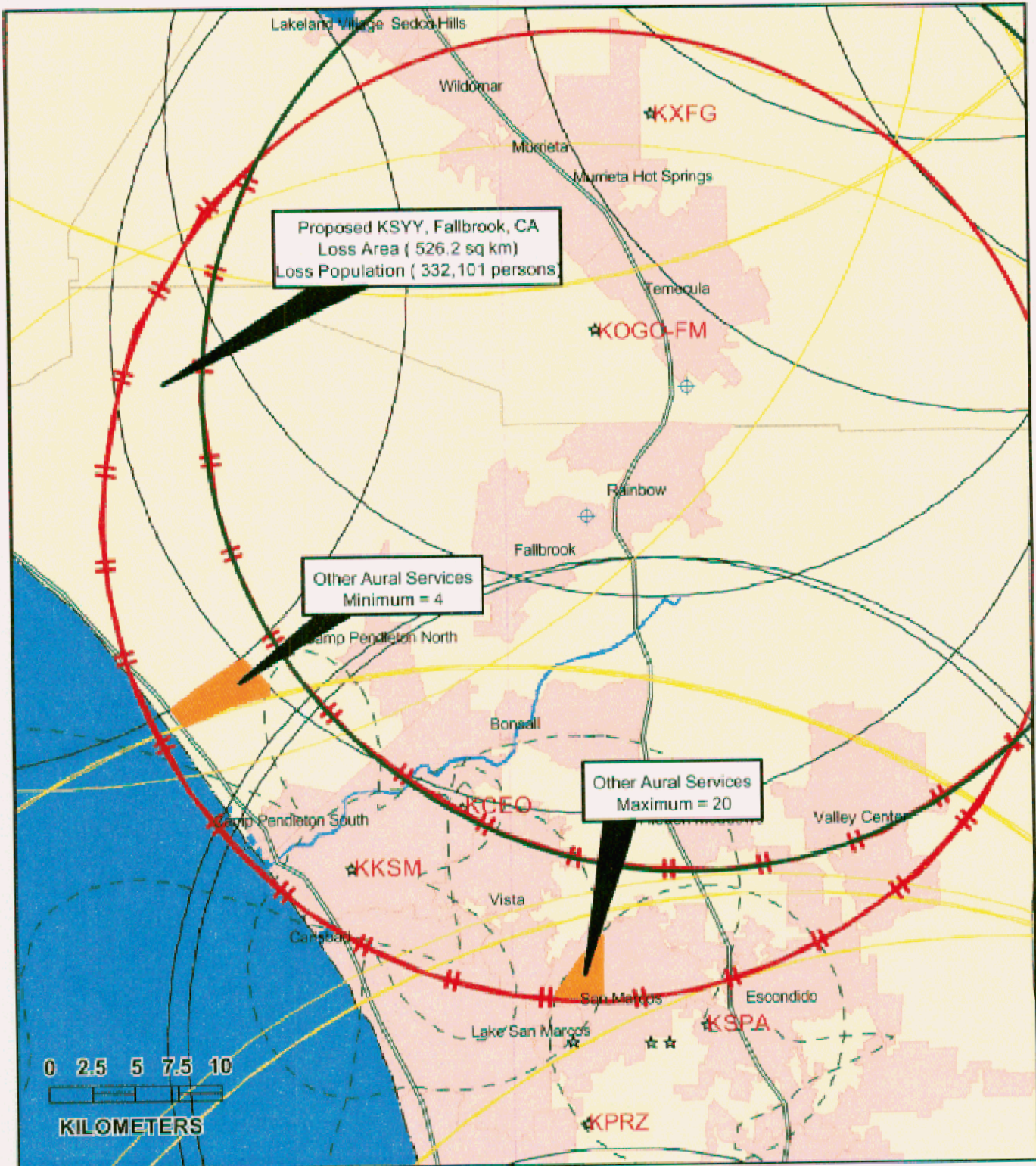
MIN = 3

KXRD	208B1	Victorville, CA	KNX	1070kHz	Los Angeles, CA
			KFI	640kHz	Los Angeles, CA

(All of these contours are shown on the attached map Exhibit #5)

Other AM/FM Services (Key to 60dBu Circles and Class Radius)
 Class A: Black, 28km Class B1: Purple, 39km
 Class B: Yellow, 52km AM: Dashed Green

EXHIBIT 6



OTHER AURAL SERVICES
 LOSS AREA STUDY FOR KSYY, FALLBROOK, CA
 WITH MINIMUM & MAXIMUM VALUES
 AUGUST, 2002

TABLE 4

Facilities Providing Service To The Fallbrook, CA Loss Area

MAX = 20

KLNV	293B	San Diego, CA	KMYI	231B	San Diego, CA
KGB-FM	268B	San Diego, CA	KPLN	279B	San Diego, CA
KSON-FM	247B	San Diego, CA	KFSD-FM	221A	Escondido, CA
KPRI	271B	Encinitas, CA	KRTM	205B	Temecula, CA
KLQV	275B	San Diego, CA	KBZT	235B	San Diego, CA
KOCL	239B	Carlsbad, CA	KSPA	1450kHz	Escondido, CA
KIOZ	287B	San Diego, CA	KPRZ	1210kHz	San Marcos-Poway, CA
KFMB-FM	264B	San Diego, CA	KCEO	1000kHz	Vista, CA
KIFM	251B	San Diego, CA	KNX	1070kHz	Los Angeles, CA
KYXY	243B	San Diego, CA	KFI	640kHz	Los Angeles, CA

MIN = 4

KWVE	300B	San Clemente, CA	KNX	1070kHz	Los Angeles, CA
KPRI	271B	Encinitas, CA	KFI	640kHz	Los Angeles, CA

(All of these contours are shown on the attached map Exhibit #6)

Underserved Area Details:

Proposed KSYU Channel Change at Fallbrook, CA

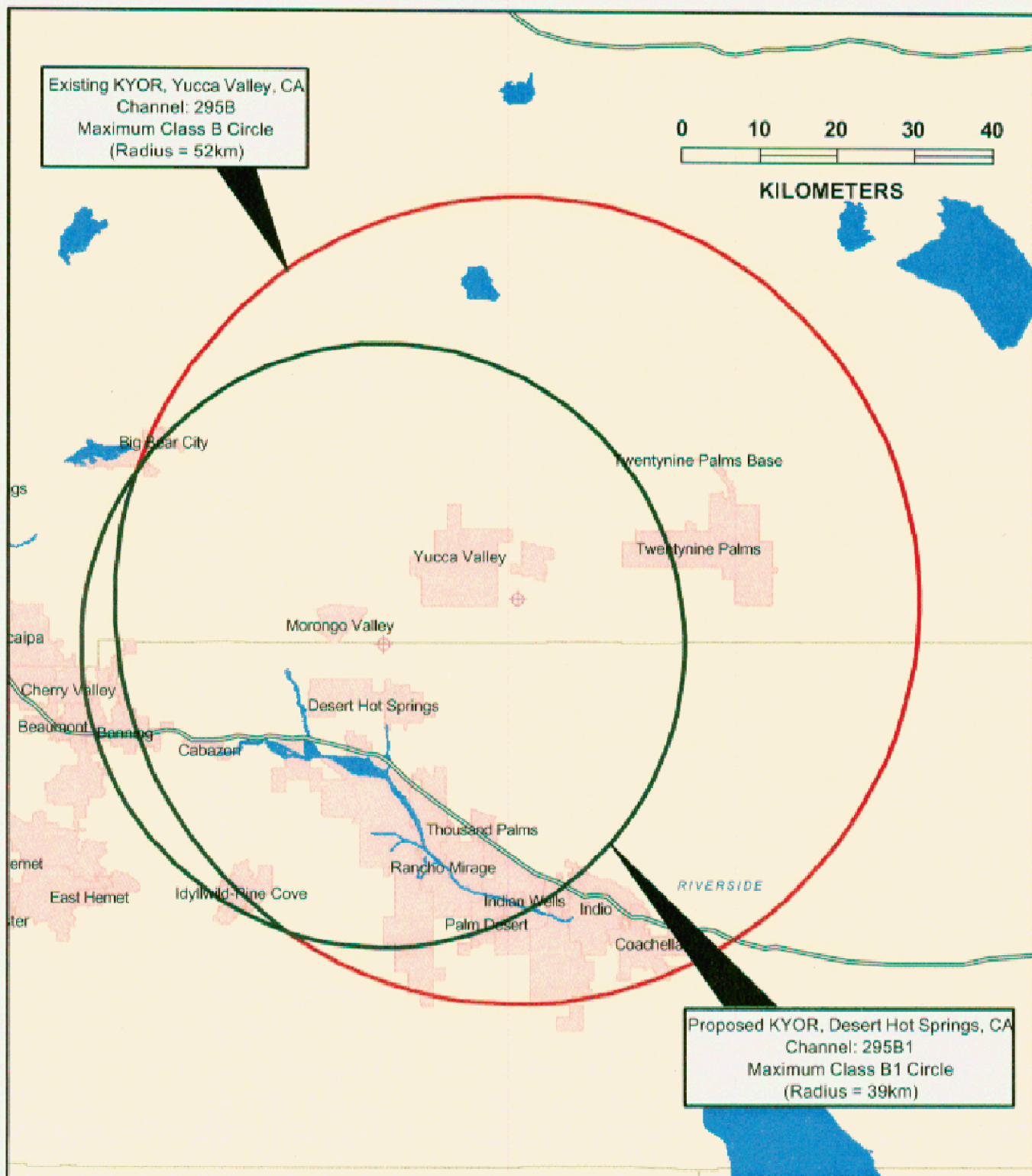
Underserved Areas Created In KSYU Loss Area (area and population):

- 4 Aural Services Remaining 9.2 km² 0 persons
- No New Gray Areas
- No New White Areas

Underserved Areas in KSYU Gain Area (area and population):

- 4 Aural Services* 31.4 km² 359 persons
- 3 Aural Services 81.2 km² 521 persons

* KSYU will be a fifth aural service to this area which will become well-served.



Loss Area Population: 143,782 persons

Loss Area Coverage: 3,954 sq km

Gain Area Population: 16,429 persons

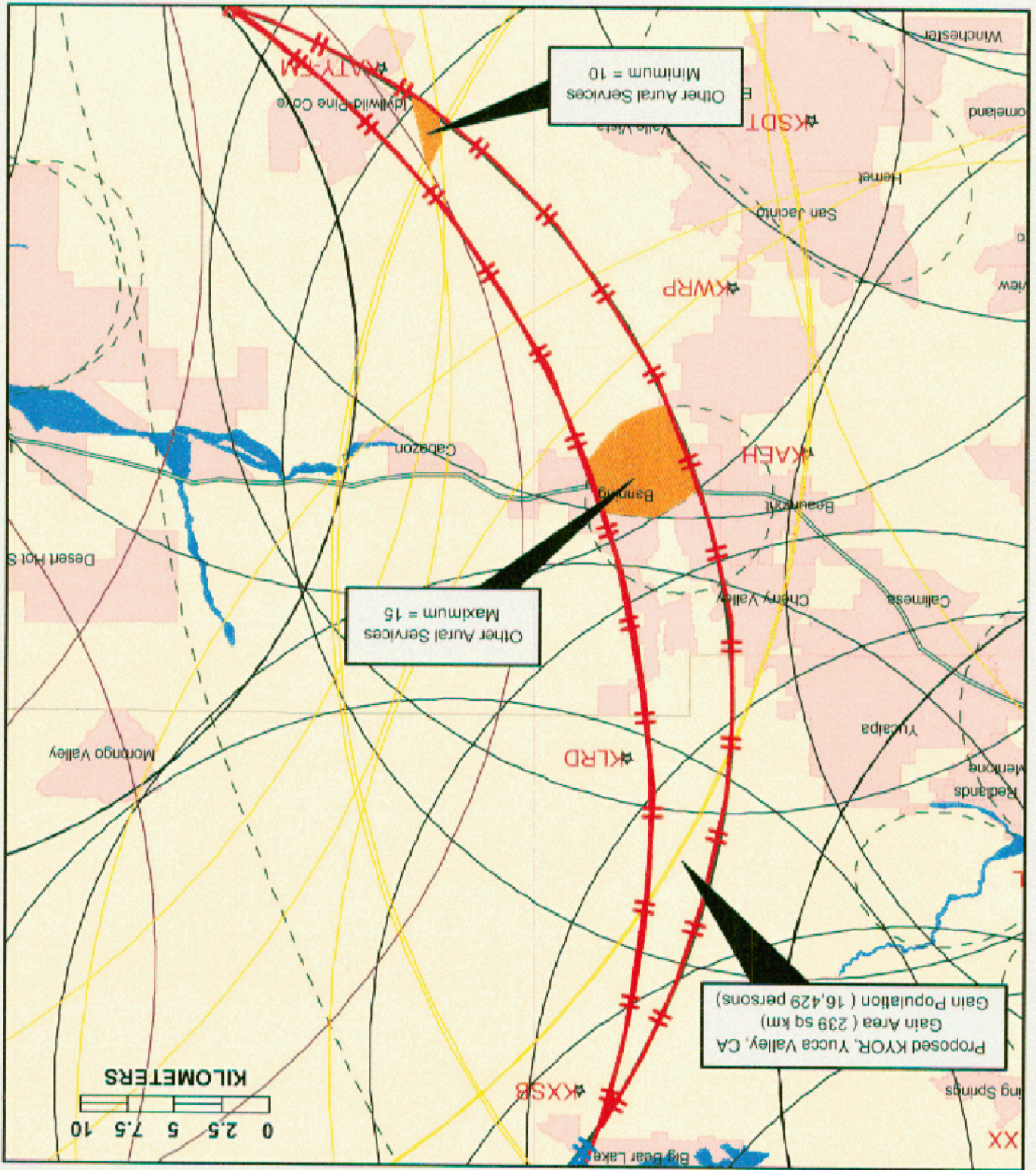
Gain Area Coverage: 239 sq km

CARL T. JONES
CORPORATION

EXISTING & PROPOSED COVERAGE CIRCLES
FOR KYOR, YUCCA VALLEY, CA
CHANNEL DOWNGRADE 295B TO 295B1
AUGUST, 2002

Other AM/FM Services (Key to 60dBu Circles and Class Radius)
 Class A: Black, 28km
 Class B: Yellow, 52km
 AM: Dashed Green

EXHIBIT 8



OTHER AURAL SERVICES
 GAIN AREA STUDY FOR KYOR, YUCCA VALLEY, CA
 WITH MINIMUM & MAXIMUM VALUES
 AUGUST, 2002

CARL T. JONES
 CORPORATION

TABLE 5

Facilities Providing Service To The Yucca Valley, CA Gain Area

MAX = 15

KDES-FM	284B	Palm Springs, CA	KXRS	289A	Hemet, CA
KWXY-FM	253B	Cathedral City, CA	KATY-FM	267A	Idyllwild, CA
KSSE	248B	Riverside, CA	KAEH	265A	Beaumont, CA
KFRG	236B	San Bernardino, CA	KWRP	241A	San Jacinto, CA
KLRD	211B	Yucaipa, CA	KNX	1070kHz	Los Angeles, CA
KGGI	256B	Riverside, CA	KFI	640kHz	Los Angeles, CA
KOLA	260B	San Bernardino, CA	KMET	1490kHz	Banning, CA
KVCR	220B	San Bernardino, CA			

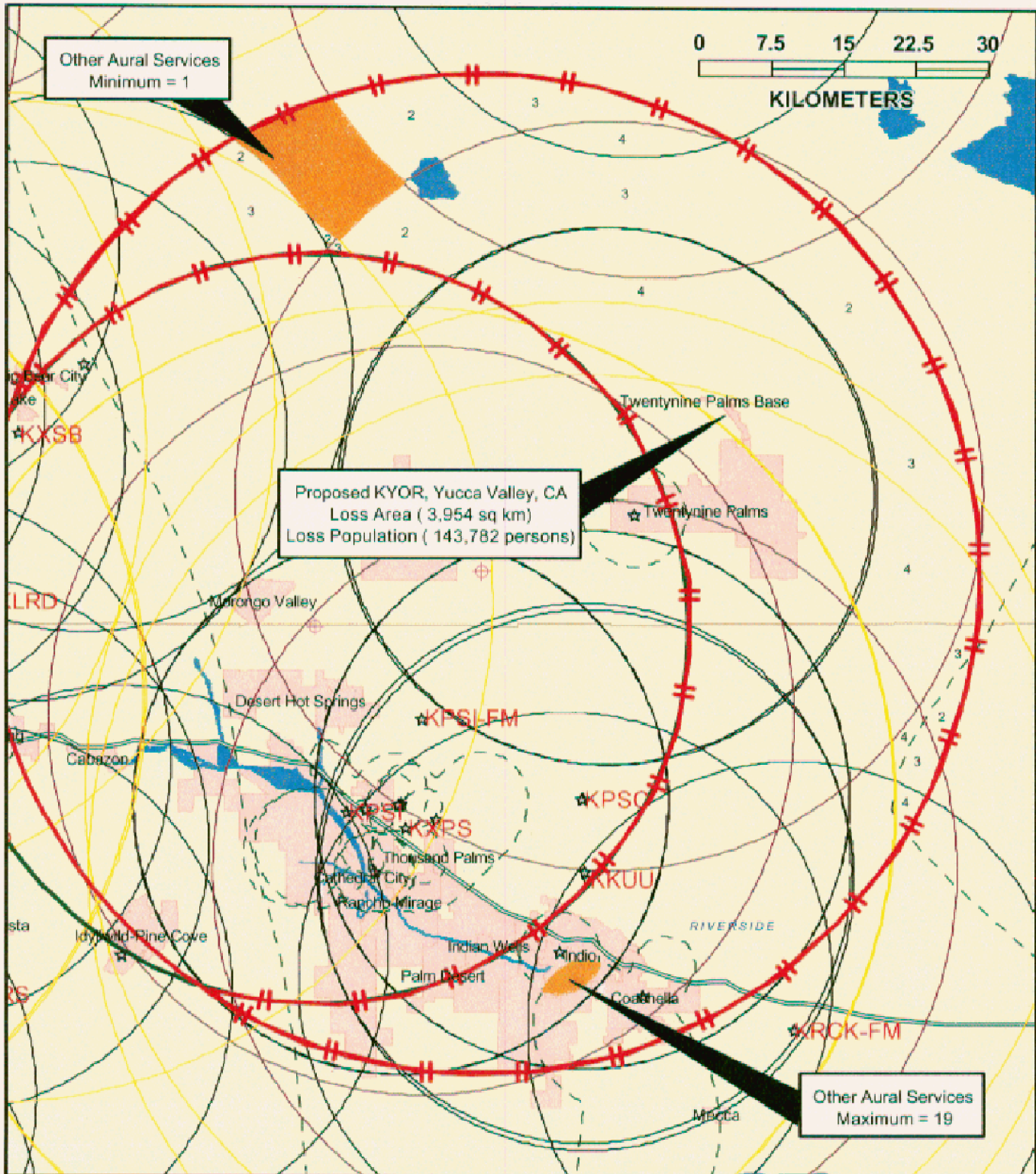
MIN = 10

KDES-FM	284B	Palm Springs, CA	KATY-FM	267A	Idyllwild, CA
KWXY-FM	253B	Cathedral City, CA	KAEH	265A	Beaumont, CA
KCLB-FM	229B	Coachella, CA	KWRP	241A	San Jacinto, CA
KLRD	211B	Yucaipa, CA	KNX	1070kHz	Los Angeles, CA
KXRS	289A	Hemet, CA	KFI	640kHz	Los Angeles, CA

(All of these contours are shown on the attached map Exhibit #8)

Other AM/FM Services (Key to 60dBu Circles and Class Radius)
 Class A: Black, 28km Class B1: Purple, 39km
 Class B: Yellow, 52km AM: Dashed Green

EXHIBIT 9



OTHER AURAL SERVICES
 LOSS AREA STUDY FOR KYOR, YUCCA VALLEY, CA
 WITH MINIMUM & MAXIMUM VALUES
 AUGUST, 2002

TABLE 6

Facilities Providing Service To The Yucca Valley, CA Loss Area

MAX = 19

KPLM	291B	Palm Springs, CA	KUNA-FM	244A	La Quinta, CA
KDES-FM	284B	Palm Springs, CA	INDIAN		Indian Wells, CA
KWXY-FM	253B	Cathedral City, CA	KKUU	224A	Indio, CA
KCLB-FM	229B	Coachella, CA	KPSC	203A	Palm Springs, CA
KPSI-FM	263B1	Palm Springs, CA	KEZN	276A	Palm Desert, CA
KCRI	207B1	Indio, CA	KLOB	234A	Thousand Palms, CA
KRCK-FM	249A	Mecca, CA	KHCS	219A	Palm Desert, CA
KJJZ	272A	Mecca, CA	KFI	640kHz	Los Angeles, CA
KMRJ	258A	Rancho Mirage, CA	KESQ	1400kHz	Indio, CA
KNWZ	970kHz	Coachella, CA			

MIN = 1

KFI	640kHz	Los Angeles, CA
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(All of these contours are shown on the attached map Exhibit #9)

Underserved Area Details:

Proposed KYOR Yucca Valley, CA to Desert Hot Springs, CA

Underserved Areas Created In KYOR Loss Area (area and population):

- 4 Aural Services Remaining 444.8 km² 5776 persons

Details of Existing Underserved Areas of KYOR Loss Area (area and population):

- 3 Aural Services 563.1 km² 380 persons
- 2 Aural Services 349 km² 22 persons
- 1 Aural Service* 119 km² 0 persons
- No New White Areas

* The proposed change at KYOR will create this new, unpopulated, gray area.

The Entire KYOR Gain Area is Well-Served (i.e. currently served by at least 10 aural services).